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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
W.D. OF TN, MEMPHIS

Latoya Coleman

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

UnitedHealthGroup Inc.

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Latoya M Coleman
(name of plaintiff)

is a citizen of the United States and resides at 875 Federal Ridge Hwt 208
(street address)

Collierville
(city)

USA
(country)

TN
(state)

38017
(zip code)

9013419810
(telephone number)

3. Defendant United Health Group & William Bosarge, Walter Harrison
(defendant's name)

lives at, or its business is located at 3175 Lenox Park Blvd - Memphis
(street address)

Office address. Corporate Office is in Minna.
William Bosarge & Walter Harrison is located in Brentwood, TN

4. Plaintiff sought employment from the defendant or was employed by the defendant at

3175 Lenox Park Blvd Suite 400

Memphis USA TN 38115
(city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about Jan-May 2010-2011.

(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about N/A

(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 21 SEP 2010

(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 21 12 2011. (Attach a copy of the notice to this complaint.)
(day) (month) (year)

9. Because of plaintiff's (1) ☒ race, (2) ☐ color, (3) ☒ sex, (4) ☒ religion, (5) ☐ national origin, defendant

(a) ☐ failed to employ plaintiff.

(b) ☒ terminated plaintiff's employment.

(c) ☒ failed to promote plaintiff.

(d) "Called me a 'Coon' more than once in writing Emails told me I would not be promoted because I was young & black.

Worked on my mail at work reported everything internally with no success also I have attachments to prove this. Also I filed two charges with EEOC they retaliated against me by faking my doctor's name on an EEOC recommendation form & punishing me. I have Emails to Prove it.

10. The circumstances under which defendant discriminated against plaintiff were as follows: in 2010 Walter Harrison discriminated against me by saying he is a "Red Neck" & "an a funny "Coon" because I wanted a job promotion. He then stated if I was with him one on one I could receive a promotion. He attempted to get me into a hotel room. He stated sexual advancements towards me. I reported this to HR internally also, & after he left the company. His manager became my manager & he was upset with me for filing my 1st EEOC charge against Walter. So the termination was while I was on intermediate FMLA to stress he retaliated. Evidence shows it"

11. The acts set forth in paragraph 9 of this complaint

- (a) ☐ are still being committed by defendant.
 (b) ☐ are no longer being committed by defendant.
 (c) ☒ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint. because it's no harder for me to get a job cause they are advertising saying bad things about me.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) ☒ Defendant be directed to employ plaintiff, or
 (b) ☒ Defendant be directed to re-employ plaintiff, or
 (c) ☐ Defendant be directed to promote plaintiff, or;
 (d) ☐ Defendant be directed to pay my back time wages cause I unfairly lost my job & now it's hard to find one.

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes (☒) No (☐)

Latoya Coleman
 SIGNATURE OF PLAINTIFF